

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

ASHLEY DIAMOND,)	
)	
Plaintiff,)	
)	
v.)	No. 5:15-cv-00050-MTT-CHW
)	
BRIAN OWENS, et al.,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Ashley Diamond moves this Court for the issuance of a preliminary injunction (1) directing Defendants to provide Plaintiff with medically necessary treatment for her gender dysphoria including, but not limited to, providing Plaintiff hormone therapy and allowing her to express her female gender through grooming, pronouns, and dress; and (2) enjoining Defendants from enforcing the policies that have served as a moving force behind their constitutional violations by denying inmates with gender dysphoria individualized medically appropriate treatment and care.

The grounds for this Motion are set forth in the accompanying Memorandum of Law. Plaintiff also respectfully refers the Court to Plaintiff’s Verified Complaint, the Declaration of Dr. Randi C. Ettner, and the Declaration of A. Chinyere Ezie.

Plaintiff respectfully requests oral argument on this motion.

Dated: February 20, 2015

Respectfully submitted,

/s/ James M. Knoepp
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Counsel for Plaintiff

**Applications for admission pro hac vice
forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing document will be served on the Defendants in this action, along with copies of the Summons and Complaint. Plaintiff agrees to file a notice with the Court upon completion of Service.

Dated: February 20, 2015

/s/ James M. Knoepp

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